

REMARKS

Reconsideration and withdrawal of all grounds of rejection, and allowance of all the pending claims are respectfully requested. Claims 1-6 and 8-14, as amended, remain pending herein. Claim 7 has been canceled without prejudice or disclaimer, and its subject matter incorporated into claim 1.

Applicant respectfully submits that with regard to claim 14, the sole ground of rejection cited against claim 14 under 35 U.S.C. §112, second paragraph, is overcome.

Claims 1-13 stand rejected under 35 U.S.C. §103(a) over Lippmann *et al.* (U.S. Pat. Appln. Pub. No. 2003/0127709) ("Lippmann") in view of Baukus *et al.* (U.S. 6,613,661) ("Baukus"). Applicant respectfully traverses this ground of rejection for the reasons indicated herein below.

Applicant respectfully submits that claim 1 has been amended to recite in part:

wherein a majority of the fill structures generated are incorporated along a signal path so that active, electrically connected parts of the fill structures are situated next to dummy fill structures that are insulated from the active electrically connected parts of the fill structures.

Support for the above amendment is found at least in original claim 7 and the specification at page 5, lines 3-9.

Applicant respectfully submits that none of the present claims would have been obvious to a person of ordinary skill in the art at the time of invention over the combination of Lippmann and Baukus, at least for the reasons that the combination fails to disclose or in any way render obvious the combination of elements recited in claim 1.

For example, with regard to the combination of Lippmann and Baukus, it is admitted in the Office Action that Lippmann fails to disclose additional circuit functions generated, but that Baukus allegedly provides this teaching. However, Applicant respectfully submits that the cited portion of Baukus (in combination with Lippmann) does not disclose or render obvious the recitation of additional circuit functions are incorporated along a signal path so that active electrically connected parts of the fill structures are situated next to dummy fill structures that are insulated from the active electrically connected parts of the fill structures.

Moreover, the cited FIGs. 6 and 7 of Lippmann shows nothing more than a cross-section of a semiconductor device and its associated passivation layers, which in combination with Baukus, does not disclose the elements recited in claim 1, nor would claim 1 have been obvious to person of ordinary skill in the art at the time of invention in view of the combination or references. In the combination of references there is no disclosure regarding a signal path with electrically active parts situated next to dummy fill structures that perform additional circuit functions shown, nor is such a recitation of present claim 1 suggested or rendered obvious by the combination of Lippmann and Baukus.

For all the foregoing reasons, Applicant respectfully submits that claim 1 would not have been obvious over the combination of references. In addition, all claims dependent from claim 1 are also believed patentable because of both a dependency from claim 1, which is believed to be allowable, and due to an independent basis for patentability. For example, the arbitrary interlinkings (horizontally and vertically) of the fill strictures, as recited in present claim 5, is clearly not disclosed or rendered obvious by

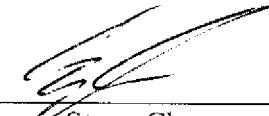
the combination of Lippmann and Baukus. Individual consideration of each claim on its own merits is respectfully requested.

Applicant also respectfully submits that none of the combinations of elements, as recited in any of claims 1-6 and 8-14 would have been obvious at the time of invention as being within the ordinary level of skill in the art (*KSR International v. Teleflex*, 127 S. Ct. 1727, 82 USPQ2d 1385 (2007)).

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

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